UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS	FILED
FOR THE DISTRICT OF MASSACHUSETTS 1 124	EMBO UNITO

	7.85 APR 13 P 3:4:
CROSS COUNTRY MOTOR CLUB INC., and	
CROSS COUNTRY MOTOR CLUB OF	LISTERNI COURT DISTRICT OF MASS.
CALIFORNIA, INC.	
	CIVIL ACTION NO. 05-10086-JLT
Plaintiffs,	
v.	
SYKES CANADA CORPORATION	) ) )
Defendant.	
	)

## JOINT MOTION TO EXTEND TIME FOR SYKES CANADA TO RESPOND TO THE COMPLAINT

The plaintiffs Cross Country Motor Club, Inc. and Cross Country Motor Club of California, Inc. (together "Cross Country") and the defendant, Sykes Canada Corporation ("Sykes"), hereby move the Court to extend the time for Sykes to respond to the Complaint to and including June 25, 2005. As grounds for this motion, the parties state as follows:

- 1. The parties have agreed to engage in mediation in an effort to resolve the disputes that exist between them, including those claims set forth in this action.
- 2. In advance of the mediation and to aid the mediation, the parties have agreed to permit certain limited financial inquiry and exchanges. This process is expected to conclude on or about May 31, 2005.
- 3. The parties request that Sykes have twenty days from the conclusion of mediation to respond to the Complaint.
- 4. Accordingly, on the assumption that the mediation will conclude on or about June 5, 2005, the parties ask the Court to extend the date by which Sykes may respond to the complaint to and including June 25, 2005.

5. Sykes reserves its right to raise, and does not waive, all available objections and defenses to the Complaint, including without limitation, objections to jurisdiction and venue.

CROSS COUNTRY MOTOR CLUB INC., and CROSS COUNTRY MOTOR CLUB OF CALIFORNIA, INC.

By their attorneys,

Vita H. Polh (Bre) Victor H. Polk (BBO #5460999)

Bingham McCutchen LLP

150 Federal Street Boston, MA 02110 (617) 951-8000 Tel (617) 951-8736 Fax by its attorneys,

Brenda M. Cotter (BBO #548004)

Jeffrey P. Hermes (BBO #637952)

SYKES CANADA CORPORATION

Samantha L. Gerlovin (BBO #652389)

BROWN RUDNICK BERLACK ISRAELS LLP

One Financial Center Boston, MA 02111 (617) 856-8200 Tel (617) 856-8201 Fax

Dated: April 13, 2005

# 1356565 v3 - cotterbm - 024898/0001